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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA,  
SOUTHERN DIVISION**

10 LISA LIBERI, et al,  
11 Plaintiffs,  
12  
13 vs.  
14  
15 ORLY TAITZ, et al,  
16 Defendants.  
CIVIL ACTION NUMBER:  
**8:11-cv-00485-AG (AJW)**  
**DECLARATION OF LISA**  
Date of Hearing: October 11  
Time of Hearing: 10:00 a.m.  
Location: Courtroom

## **Declaration of Lisa Liberi**

I, Lisa Liberi, am over the age of 18 and am a party to the within action. I have personal knowledge of the facts herein, and if called to do, I could and would competently testify. I am making this Declaration under the penalty of perjury of the Laws of the United States pursuant to 28 U.S.C. §1746 and aver as follows:

1. All through the Law Offices of Orly Taitz [“L.O.O.T.”] Motion to Dismiss, Docket No. 376 and Amended Motion to Dismiss, Docket No. 377, Orly

1 Taitz [“Taitz”], Attorney for L.O.O.T. has lied repeatedly and is again attempting  
2 to change the history of this case and the events evolving around why this lawsuit  
3 was filed.  
4

5 2. In fact, Orly Taitz’s filing of September 14, 2011, L.O.O.T.’s Motion  
6 to Dismiss, Docket No. 376 was posted by Orly Taitz all over the Internet at:  
7

8 **Defendant Orly Taitz's Website, <http://www.orlytaitzesq.com> at:**

9 <http://www.orlytaitzesq.com/?p=25553>  
10 [http://www.orlytaitzesq.com/?attachment\\_id=25552](http://www.orlytaitzesq.com/?attachment_id=25552)  
11 [http://www.orlytaitzesq.com/?attachment\\_id=25551](http://www.orlytaitzesq.com/?attachment_id=25551)  
12 [http://www.orlytaitzesq.com/?attachment\\_id=25550](http://www.orlytaitzesq.com/?attachment_id=25550)  
13 [http://www.orlytaitzesq.com/?attachment\\_id=25549](http://www.orlytaitzesq.com/?attachment_id=25549)  
14 <http://www.orlytaitzesq.com/wp-content/uploads/2011/09/Lisa-Liberi-criminal-record-bankruptcy-record.pdf>  
15 <http://www.orlytaitzesq.com/wp-content/uploads/2011/09/Liberi-v-Taitz-12.23.2010-pdf-memorandum-by-Judge-Robreno.pdf>  
16 <http://www.orlytaitzesq.com/wp-content/uploads/2011/09/Liberi-v-TAaitz-10.10.2011-hearing-motion-to-dismiss-Law-offices.pdf>  
17 <http://www.orlytaitzesq.com/wp-content/uploads/2011/09/declaration-of-Lisa-Liberi-first-5-digits-of-SSN-redacted-.pdf>  
18

19 **Defendant Orly Taitz and Defendant Dr. Orly Taitz's Facebook pages at:**  
20

21 <http://www.facebook.com/orlytaitz/posts/10150295924320975>  
22 <http://www.facebook.com/dr.orly.taitz/posts/10150312895303950>  
23 [http://www.facebook.com/dr.orly.taitz?sk=app\\_9953271133](http://www.facebook.com/dr.orly.taitz?sk=app_9953271133)  
24 <http://www.facebook.com/dr.orly.taitz>  
25 <http://www.facebook.com/orlytaitz?sk=wall>  
26 <http://networkedblogs.com/n6vA1>  
27 <http://networkedblogs.com/n6vA1?a=share&ref=nf>  
28

29 **Defendant Orly Taitz's *Before it's News*:**  
30 <http://beforeitsnews.com/bio/000000000024233> at pages at:  
31

<http://beforeitsnews.com/story/1101/559submitted to Judge Andrew Guilford in Central District of CA today.html>

Taitz published her false pleadings all over the Internet to give her lies credibility and to further harm Lisa Ostella, Mr. Berg and me with her continued inciting, false allegations, false recitations and flat out lies.

3. I filed suit against Ms. Taitz and the other Defendants as a result of the illegal background checks conducted on me; the illegal access of my credit reports; the illegal disclosure of my full Social Security number, date of birth, place of birth, mother's maiden name, father's name, home address, telephone number, the harassment of my friends and family, and Ms. Taitz's disclosure of my private details to John Mark Allen, my son's father who my son and I were provided protection from as a result of the crimes committed against us. Ms. Taitz continues twisting the reasons Plaintiffs filed suit and continues misstating the truth. All of the foregoing Orly Taitz has admitted in her Motion to Dismiss filed on behalf of Defend our Freedoms Foundations, Inc., Docket No. 283.

4. Orly Taitz has threatened me several times. Orly Taitz stated she was going to destroy me and get rid of me, which Orly Taitz has admitted in her Court filings. Orly Taitz has put on the Internet and on her website that I needed to be “gotten” rid of and other threats. Not only has Orly Taitz made these direct threats, she has also implied her intentions and threats with all her postings, her statements,

1 her circulation of my pictures and home address, sending my private details along  
2 with my pictures to white supremacy groups, hate groups, armed militia groups,  
3 posting about me on average every two [2] to three [3] days for the past two and  
4 one-half [2-1/2] years, calling for her supporters in Santa Fe, New Mexico where I  
5 reside to assist her regarding me, etc.  
6  
7

8 5. Orly Taitz has been asked to stop; Orly Taitz has been served with all  
9 the pleadings in this case; she has all the transcripts of all hearings; Orly Taitz is  
10 well aware her actions have put me in fear of my life and fear for the lives of my  
11 son and husband; regardless, Orly Taitz has continued her actions.  
12  
13

14 6. Orly Taitz is aware I have heart complications; she understands what  
15 this means as she has repeatedly stated she is a doctor, a dentist and a lawyer. Orly  
16 Taitz is also aware of the complications her harassment has caused me; the  
17 hospitalizations, etc. Regardless of this, Orly Taitz has continued her behaviors.  
18  
19

20 7. I watch Orly Taitz's website at [www.orlytaitzesq.com](http://www.orlytaitzesq.com) as do witnesses  
21 of ours for Orly Taitz's postings. All of Orly Taitz postings on file with this Court  
22 I have obtained, as well as other individuals, directly from Orly Taitz's website by  
23 going to <http://www.orlytaitzesq.com>, I then print them to PDF format and  
24 maintain a hard copy.  
25  
26

27 8. Orly Taitz, on behalf of her law practice, falsely claims on her first  
28 page that Lisa Ostella, Mr. Berg and I worked together. This is a complete lie and

1 Taitz knows it. Mr. Berg and I did not meet Lisa Ostella until the end of April,  
2 beginning of May 2009 when it was decided to file suit against Orly Taitz and the  
3 other Defendants. We were introduced by Evelyn Adams, a Plaintiff in the Texas  
4 version of this case. Lisa Ostella did assist Mr. Berg one time, after the within suit  
5 was filed, with his website on an emergency basis, that was it. It was Orly Taitz  
6 who brought us together as Lisa Ostella and myself were being viciously attacked  
7 and falsely accused of crimes that we never committed, as well as other false  
8 allegations by Taitz.  
9

10 9. Orly Taitz states on the first page of her Motion to Dismiss [“MTD”]  
11 and Amended MTD that we filed suit against her and her family and relatives as a  
12 result of them “blowing the whistle” on me, “Berg” and “Ostella”. This is a  
13 complete lie. There were not any whistles to blow. Orly Taitz has not blown the  
14 whistle on anyone. Orly Taitz manufactures statements about people to belittle  
15 them, harass them, bully them, embarrass them, libel, slander and defame them and  
16 manufactures, creates and forges documents in attempts to substantiate her false  
17 allegations. This is not whistle blowing.  
18

19 10. As explained below, I believe Orly Taitz was seeking my help to  
20 blame me for her forgeries, fraudulent documents, and criminal behaviors, as she  
21 was aware I had a criminal conviction. But, Taitz’s plan did not work as I refused  
22 to have anything to do with her. Taitz has a pattern of illegal acts, filing altered  
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1 and fraudulent documents with our Courts and attacking those who refuse to give  
2 her what she wants.  
3

4 11. I have never had anything to do with Orly Taitz. Orly Taitz sought  
5 the help of Mr. Berg and me. I spoke to Orly Taitz one time, which was in or  
6 about November 2008. Orly Taitz wanted me to assist her with a Writ of Cert in  
7 the U.S. Supreme Court. I declined and refused to have anything to do with her.  
8

9 12. I later learned that the case she was collecting monies for, that she  
10 wanted my assistance with, Lightfoot v. Bowen, was never filed in a trial Court.  
11 Orly Taitz was lying to her supporters and collecting monies based on her false  
12 statements. What Orly Taitz had done was attempted to file the case for its first  
13 time by way of a Writ of Mandamus for a Stay in the California Supreme Court,  
14 and was denied. Ms. Taitz was then attempting to appeal to the U.S. Supreme  
15 Court, which as this Court is aware, is completely improper. See Lightfoot v.  
16 Bowen, California Supreme Court Case No. S168690, filed December 3, 2008,  
17 Denied December 5, 2008.  
18

22 13. Ms. Taitz then filed for an Emergency Stay with Justice Kennedy in  
23 the U.S. Supreme Court on December 17, 2008, which was Denied; Taitz re-filed it  
24 December 29, 2008 to the Chief Justice. Since this was the second submission of  
25 the Emergency Stay, pursuant to U.S. Supreme Court Rules, the Court set it for  
26 Conference so all the Justices could review it, accept it or deny it in one sitting.  
27  
28

1 Instead of telling her supporters the truth, Orly Taitz continued lying to all her  
2 supporters screaming her filings had merit and it was set for conference, at the  
3 same time asking for her supporters to continue donating, which they did on her  
4 false statements. Ms. Taitz then attempted to recuse the Justices in the U.S.  
5 Supreme Court from hearing the matter. Once Ms. Taitz was denied by the panel,  
6 she viciously went after Danny Bickel, the U.S. Supreme Court Stays Clerk. Orly  
7 Taitz falsely accused Danny Bickel of all types of crimes, including taking “kick-  
8 backs” and “pay-offs” in the tobacco cases. *See Lightfoot v. Bowen*, U.S. Supreme  
9 Court, Case No. 08A524.

10  
11  
12  
13 14. Thereafter, Taitz turned her attacks and false allegations on Lisa  
15 Ostella, Mr. Berg and me. Orly Taitz attacks then began on Judge Clay D. Land in  
16 Georgia; Judge David O. Carter’s Law Clerk in this Court, Siddharth Velamoor,  
17 Chief Judge Royce Lamberth and his staff in Washington, D.C.; the list goes on.  
18 As this Court can see, Taitz has a pattern of attacking those who disagree with her  
19 or who will not do as she wants.

20  
21  
22 15. While Taitz was attacking me, falsely accusing me of committing  
23 crimes and trying to have me falsely arrested, Orly Taitz filed two [2] forged  
24 Kenyan Birth Certificates or Certifications of Live Birth in Judge David O.  
25 Carter’s Court. One of these was provided to Orly Taitz by Lucas Daniel Smith, a  
26 convicted forger of identity documents. Taitz then began filing forged and altered  
27  
28

1 documents in our case in Lisa Ostella's name and my name, as pointed out  
2 numerous times on the docket.  
3

4 16. Most recently, Orly Taitz filed documents in the case of Taitz v.  
5 Astrue, U.S.D.C., District of Columbia Case No. 1:11-cv-00402 RCL that had been  
6 fraudulently obtained in the name of President Obama. *See* Judge Royce C.  
7 Lamberth's Opinion of August 30, 2011, footnote at pages 7-8, this opinion is  
8 attached hereto and incorporated in by reference as **EXHIBIT “1”**. Judge  
9 Lamberth in his Opinion stated:  
10  
11

12 “The Court can only conclude that plaintiff has submitted a form that some individual  
13 obtained through a false request and subsequently posted online. Plaintiff also submits  
14 a “verification results” page from the Social Security Number Verification System  
15 (“SSNVS”) indicating that social security number xxx-xx-4425 is “not in file (never  
16 issued.)” Pl.’s Opp’n to Mot. for Summ. J. Ex. 2 [31]. She argues that this page is  
17 further evidence that the SSA is covering up the President’s use of social security  
18 number xxx-xx-4425. The SSA uses the SSNVS to provide employers with a means  
19 of verifying the names and social security numbers of employees. See SSNVS  
20 Handbook, <http://www.ssa.gov/employer/ssnvshandbk/ssnvsHandbook.pdf>. “Anyone  
21 who knowingly and willfully uses SSNVS to request or obtain information from SSA  
22 under false pretenses violates Federal law and may be punished by a fine,  
23 imprisonment or both.” Id. at 5. As with the registration acknowledgement form  
24 discussed above, the Court can only conclude that plaintiff has submitted a page that  
25 some individual obtained under false pretenses—that is, by representing himself as the  
26 President’s employer. The Court notes that both documents submitted by plaintiff are  
27 incomplete; the address on the registration acknowledgment form and the employer  
28

1 identification number on the SSNVS page have been blacked out, further confirming  
2 the documents' fraudulent origins."

3  
4 17. If interested, the Court can easily find these documents referred to by  
5 Judge Lamberth as Orly Taitz is the person who posted them all over the Internet.  
6 Taitz posted them all over her website at <http://www.orlytaitzesq.com>, on all her  
7 Facebook pages, social network sites, tweeted them and sent them to private and  
8 public blogs and websites demanding everyone to post the documents. Just as she  
9 (Taitz) has done with her pleadings in this case.  
10  
11

12 18. As this Court can see, the only person committing any type of  
13 fraudulent crimes is Orly Taitz herself and then accusing us, her victims, of what  
14 she is doing.  
15

16 19. On page six of Taitz's MTD and Amended MTD she accuses Lisa  
17 Ostella of using "the website" to sell t-shirts and other financial endeavors and that  
18 Ostella failed to provide Taitz with any type of accounting. Taitz is again lying  
19 and making up false allegations. Evidence was filed with this Court proving Lisa  
20 Ostella was not selling anything on the websites; instead it was Taitz and her  
21 volunteers, followers and supporters. *See* Plaintiffs Objections filed May 31, 2011,  
22 Docket No. ["DN"] 212 at pages 4-5, ¶¶ "i" and "p", pages 6-9 and the Declaration  
23 of Lisa Ostella, DN 213 filed May 31, 2011. This was also addressed in the U.S.  
24 Court of Appeals for the Third Circuit in Case No. 10-3000 where Plaintiffs  
25  
26  
27  
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1 (Appellees) included in their supplemental Appendix filed November 7, 2010 at  
2 pages J-260-J262 and J277, screen shots and web pages showing it was another  
3 volunteer of Orly Taitz's, Lyn Shaw, who was selling T-shirts and collecting credit  
4 cards for Orly Taitz's convention in Dallas, Texas, which never took place.

5  
6 20. Taitz also states on page 6 of her MTD and Amended MTD that  
7 Ostella was sending out emails collecting donations in Taitz's name. This is  
8 another Taitz lie. I was present at the Court Hearings before Judge Robreno on  
9 August 7, 2009 and December 20, 2009, and reviewed Lisa Ostella's bank  
10 statements and PayPal records, all of which Mr. Berg provided Judge Robreno as  
11 Exhibits. Lisa Ostella did **not** receive any donations, much less those intended for  
12 Orly Taitz, which her banking and PayPal records proved. We subpoenaed Orly  
13 Taitz's PayPal records. *See* Exhibits "22" and "23" filed May 20, 2011 as DN 190.  
14 All donations Taitz falsely accused Lisa Ostella and me of stealing were in fact  
15 deposited into Taitz's PayPal accounts and transferred to Taitz's Bank of American  
16 checking accounts.  
17

18 21. On page 7, Taitz again lies to this Court and states she notified Berg  
19 that I had 27 counts and 10 convictions of forging documents. I have never been  
20 convicted of forging documents, much less 27 counts. Taitz also states I was  
21 involved in Mr. Berg's fundraising, another lie. I have never had anything do with  
22  
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1 Mr. Berg's financial accounts or fundraising. Taitz developed this false story  
2 trying to substantiate her attacks on me.  
3

4 22. Taitz on page 7 also attempts to mislead this Court and her audiences  
5 falsely stating that suit was filed because she published a report from Defendant  
6 Neil Sankey, showing my criminal record. Another lie which is contradicted by  
7 Taitz's testimony to Judge Robreno on June 25, 2011. *See* the June 25, 2011  
8 transcript at pages 41, lines 24, 25, page 42, lines 1-25 attached hereto as  
9 **EXHIBIT “2”** and appearing on the Court's docket as Exhibit “15”, DN 190-4,  
10 pages 250-251, where Taitz testifies that she did not publish Sankey's report until  
11 after suit had been filed and other false statements that she did not publish my  
12 SSN, that it was another SSN she published, lie after lie after lie. It is true that  
13 Taitz has published and republished and circulated all over the Internet different  
14 versions of print-outs which she calls my “criminal record”. These papers of  
15 Taitz's and Sankey are not my “criminal record”. I did not sue Taitz and Sankey  
16 for the publication of these papers she calls a “criminal record”.  
17

18 23. On April 17, 2009, Taitz published a document called “Dossier #6”.  
19 Dossier #6 was created by Orly Taitz and contained Orly Taitz's false statements  
20 that I had a long criminal history going back to the 1990's; that I had been  
21 convicted of forging police reports; manipulation of credit reports; that I had to pay  
22 \$21,000 per month in restitution and that I had viciously attacked her (Taitz)  
23  
24

1 because I disagreed with her definition of the law pertaining to “natural born”  
2 citizenship. In Taitz Dossier #6, Taitz included my name, my maiden name, my  
3 full Social Security number [“SSN”], my date of birth, where I resided, my  
4 husband’s name, SSN and date of birth, a partial of my old SSN and other private  
5 data. *See Dossier #6 on file with this appearing as Exhibits “13”, “14” and “54,*  
6 filed May 20, 2011 as DN’s 190-3; 190-4 and 190-10. Taitz’s Dossier #6 is also  
7 on file as DN’s 1; 3; 4; 63; 83; 102; and 190.  
8  
9

10 24. On page 9 of L.O.O.T.’s MTD and Amended MTD, Taitz again  
11 changes her story, and creates another lie. Taitz states, “*Plaintiffs’ 1st, 2nd, 3rd,*  
12 *4th, 5th, 6th, 7th, 8th, 9th causes of action arise out of Taitz alleged publication*  
13 *and re-publication of a report prepared by licensed investigator Sankey for*  
14 *internet magazine WorldNetdaily editor Bob Unruh and cc-ed to attorney Taitz.*”  
15 See Defendant Neil Sankey’s email addressed directly to Orly Taitz with a note to  
16 Taitz: Defendant Neil Sankey states, “Here is the Liberi’s stuff you requested”. *See*  
17 **EXHIBIT “3”.** Taitz’s statement in her MTD and Amended MTD are also  
18 contradicted by her own previous statements; Taitz admits to having Neil Sankey  
19 conduct a background check on both Lisa Ostella and me. *See* DN’s 1; 3; 4; 63;  
20 83; 102; 190-3; 190-4 and 190-10.  
21  
22

23 25. Taitz on page 12 of L.O.O.T.’s MTD and Amended MTD states, “As  
24 such attorneys on the case are well aware, that Liberi is a felon on probation.  
25  
26

1 Minimal investigation required under rule 11 would show that Liberi's criminal  
2 case FWV 028000 contains a fact pattern of her engaging in the same activity:  
3 cutting and pasting parts of documents and creating "documents" for which she  
4 was convicted..." Another lie by Orly Taitz to this Court and her audiences. I  
5 have never been convicted of any such thing; nor am I currently on probation.  
6

7 26. Taitz on pages 12 and 13 of L.O.O.T.'s MTD and Amended MTD  
8 states in essence it does not matter that she published my private data, my Social  
9 Security number, date of birth and other personal identifying information. Taitz  
10 states no sane person would want to assume my identity and risk going to jail for  
11 eight [8] years, and that I was bankrupt. This again is yet more lies to justify her  
12 wrong doings. Taitz and her own investigator, Defendant Neil Sankey, illegally  
13 pulled my credit in or about May 2009. Defendant Neil Sankey went on Edgar  
14 Hale's radio show and discussed a loan I had just taken out. I had taken a  
15 signature loan (a loan based just on my signature without any type of collateral)  
16 out for over Seven Thousand [\$7,000.00] Dollars for my son's college. In order to  
17 qualify for a personal loan in that amount, you must have "A" rated credit, as I did.  
18 My FICO score at that time was over 750.  
19

20 27. After the publication of all my private identifying information, loans,  
21 car loans, credit cards, and numerous other financial accounts were fraudulently  
22 opened in my name, without my knowledge and/or authorization. My credit shows  
23

1 me currently residing in Texas, Massachusetts, California, New Mexico, Virginia,  
2 and other states that I have never resided in. Defendant Orly Taitz as an Attorney,  
3 Doctor and Dentist by and through L.O.O.T. single handedly destroyed my credit  
4 and that of my husband by publishing our private identifying information.  
5 Moreover, she sent all our private identifying information internationally. How  
6 many Lisa Liberi's are entering our Country illegally? Using my Identity?  
7

8 28. Further, anyone using my identity to commit crimes would not land  
9 them in jail, since it is under my name, my identity; police would arrest me until  
10 they found that my identity had been stolen numerous times.  
11

12 29. Taitz claims that we did not plead any facts pertaining to her  
13 disclosure and publication of our Social Security numbers, and other primary  
14 identifying information. Not true, all through our Amended Complaint it is pled  
15 that I have suffered full identity theft over and over again. *See* our First Amended  
16 Complaint [“FAC”] at pgs. 41-43 ¶¶ 106-108, 110, pg. 50 ¶121, pg. 56 ¶133, pgs.  
17 59-60, ¶¶ 140-141, pg. 79 ¶ 190 and many other places in our FAC.  
18

19 30. Taitz continues on page 13 of L.O.O.T.’s MTD and Amended MTD,  
20 “*How within 2 weeks from the time the report was posted and the complaint was*  
21 *filed, this imaginary individual managed to damage Liberi?* Taitz is trying to  
22 mislead this Court into believing she only had my full Social Security number and  
23 other private identifying information posted for two [2] weeks on her site. Another  
24

1 lie by Orly Taitz. Taitz had all my primary identifying information, including my  
2 full Social Security number, date of birth, place of birth, maiden name, mother's  
3 maiden name, father's name, address, phone number, financial information, and  
4 other private information posted since April 2009 to current. Taitz's Dossier #6  
5 with my full Social Security number and private data is still available online at  
6  
7 <http://www.oilforimmigration.org/facts/?p=1478>. See EXHIBIT "4" – note, I have  
8 redacted my Social Security Number from the two [2] pages of screen shots.  
9  
10

11 31. Taitz's continues on page 13 that I entered my unredacted Social  
12 Security numbers on documents filed with Courts. Even if true, Taitz as an  
13 Attorney would have access to unredacted court documents, depending on how she  
14 identified herself. Regardless, if true, Taitz had no right to publish the documents  
15 all over the internet and my information was not online until Taitz put it there. My  
16 name was unknown on the Internet prior to all of Taitz's publications. Now, you  
17 get pages after pages in Google when you input my name; it is truly disgusting the  
18 damages Orly Taitz has caused me and my family.  
19  
20

21 32. California Courts, as this Court is aware, are required to redact any  
22 and all private confidential information from documents provided to the public.  
23 However, as stated, Attorneys have access to documents the general public does  
24 not, especially if they misrepresent themselves as being counsel for the person  
25 whom the documents relate.  
26  
27  
28

1       33. Taitz's ignorant argument is no different than me trying to convince  
2 this Court that Taitz's PayPal records have her full Social Security number and it is  
3 okay for Lisa Ostella, Philip J. Berg, Esquire or me to publish it all over the  
4 Internet. This simply is not the case.

5       34. On page 19, Taitz states in L.O.O.T.'s MTD and Amended MTD  
6 *"Liberi used likeness and trade mark of Taitz's not for profit foundation and*  
7 *solicited donations, while Liberi and Berg benefitted from those actions of Ostella,*  
8 *as she locked Taitz out of her old web site and used that web site to promote law*  
9 *office of Berg."* This is another lie of Orly Taitz. I have never used Taitz's name,  
10 or anything pertaining to Taitz's name or any of her affiliates. I have never  
11 solicited donations from anyone, much less Orly Taitz. In fact, I had never been to  
12 any of Orly Taitz's websites **until after** she published my Social Security number  
13 and other private data which was mid April 2009. I have not and did not benefit  
14 from anything pertaining to Orly Taitz; I have only suffered severe damages and  
15 extreme emotion distress as a result of Orly Taitz's actions. Not to mention the  
16 fact, Orly Taitz's contradicts her own statements in her MTD and Amended MTD.

17       35. Ms. Taitz continues stating I am a career document forger and that I  
18 have a criminal record going back to the 1990's. This is not true, I do not have a  
19 criminal record going back to the 1990's and I have not been convicted of forgery  
20 of documents or document forgery.

1       36. Further, Ms. Taitz has harassed every governmental agency in New  
2 Mexico to the point they called in the NM Attorney General to put a stop to Ms.  
3 Taitz's harassing and illegal behaviors.  
4

5       37. Moreover, Ms. Taitz called on her readers, followers and supporters to  
6 contact the law enforcement agency where I reside; she continued calling on them  
7 to further cyber-stalk; cyber-harass; and cyber-bully me; which they did.  
8

9       38. I have received nonstop phone calls stating I am going to meet my  
10 maker real soon if I don't drop this lawsuit against Ms. Taitz. I have had strange  
11 individuals show up at my home, peeking in my windows, scrambling my phones,  
12 all after Ms. Taitz publication of my home address and telephone number.  
13

14       39. My local law enforcement has been forced to take reports for Stalking,  
15 Cyber-stalking, Cyber-harassment, Cyber-bullying; fraud; forgery; identity theft;  
16 threats, where they have listed the prime suspect as Orly Taitz. This is a result of  
17 all of Orly Taitz publishing and continued republishing of her threats against me,  
18 her calling for her supporters for help regarding me; and her continued publishing  
19 of my full Social Security number, my maiden name, my mother's maiden name,  
20 my father's name, my home address, my place of birth, my date of birth and my  
21 husband's primary identification information. As a result, my husband and my  
22 identities have been stolen, our credit has been used repeatedly, accounts have  
23 been set-up fraudulently in our names using our identifying information, my credit  
24  
25  
26  
27  
28

1 report shows me residing in States I have never resided including but not limited to  
2 Massachusetts and Iowa. All the law enforcement reports were forwarded to the  
3 Federal Bureau of Investigations as the crimes crossed several state lines.  
4

5 40. As a result of Ms. Taitz's continued harassment, cyber-stalking,  
6 cyber-bullying, cyber-harassment, and other illegal acts, I have had to have  
7 emergency service from the paramedics numerous times, emergency room visits,  
8 cardiac treatments, and hospitalizations due to the complications I suffered with  
9 my heart and other medical conditions, resulting from stress induced by Orly Taitz  
10 and the other Defendants. This has cost my family in excess of Two Hundred Fifty  
11 Thousand [\$250,000.00] Dollars. My medical bills to date were provided to Judge  
12 Robreno on December 20, 2010.  
13

14 41. Ms. Taitz is well aware of what she is doing; she has talked about my  
15 medical complications on her radio shows, TV appearances and in her pleadings  
16 filed with this Court and in the same breath claims she is a doctor.  
17

18 42. As I have testified several times, I do believe Ms. Taitz attempted to  
19 hire a dangerous man in Albuquerque to carry out her threats towards me and Mrs.  
20 Ostella, to harm me and my family and harm Mrs. Ostella and her family. Ms.  
21 Taitz never disputed that Mr. Nieto's PayPal money requests were not from her  
22 PayPal account. I asked Ms. Taitz on December 20, 2010 in Judge Robreno's  
23 Courtroom if she was saying the PayPal account the money requests from Mr.  
24  
25  
26  
27  
28

1 Nieto was not her PayPal account, and Ms. Taitz answered “NO”, because they  
2 were. *See* the December 20, 2010 Transcript, page 94, lines 7-11, filed on the  
3 docket January 14, 2011, appearing as Docket Entry 162.

4  
5 43. Orly Taitz filed numerous false reports with the Santa Fe Probation  
6 Department, all of which were investigated and found to be without merit. When  
7 this failed and law enforcement refused to falsely arrest me, Orly Taitz filed an  
8 Emergency Petition in the San Bernardino County Superior Court to have my  
9 probation revoked. Orly Taitz filed these same false accusations that were filed  
10 with the Orange County Sheriff’s Department; Santa Fe Police Department; the  
11 Santa Fe Probation Department; the San Bernardino County District Attorney’s  
12 Office and the San Bernardino County Probation Office. Additionally, Orly Taitz  
13 included that I tampered with her car, jeopardizing her and her families lives and  
14 that I killed my sister.

15  
16 44. This Case had been closed for three [3] years and was reopened due to  
17 Orly Taitz’s petition. Three [3] court hearings took place, and on each hearing  
18 Orly Taitz was publishing it on her website, as filed on May 20, 2011 with this  
19 Court. *See* Docket No. 190 through 190-27, and summonsing people to attend the  
20 hearings and be “victims” of “Liberi’s”. I had to have counsel attend the hearings.  
21 The Court found absolutely no merit to Orly Taitz, Neil Sankey and Orly Taitz’s  
22 supporters false reports; I was found “not guilty” of any violations and the case  
23  
24  
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1 closed again. All of this was done with malicious intent. Orly Taitz was  
2 attempting every way possible to have me falsely accused and jailed because I was  
3 and am suing her, which was her ulterior motive.

4 45. Orly Taitz was very unhappy so she began seeking her supporters to  
5 file formal complaints against the supervising Probation Officers in San  
6 Bernardino County. Orly Taitz at this same time also put out all over the Internet  
7 that I had four [4] active felony charges, knowing this information was false. *See*  
8 **Exhibits** “125” through “128” filed May 20, 2011, which I located on Orly Taitz  
9 website by going to <http://www.orlytaitzesq.com>. Again, all of which shows Orly  
10 Taitz’s malicious intent.

11 46. I have never worked for or had anything to do with Orly Taitz. I am  
12 not a blogger; I do not and have not posted anything on the Internet, on web  
13 forums, on bulletin boards, nowhere on the World Wide Web about Orly Taitz, her  
14 company, her family, or anyone she knows. I have never authorized Orly Taitz or  
15 any of the other Defendants to publish my private data, obtain and publish my  
16 family pictures or single photos, none of which are public, publish my home  
17 address or any other information about me. I am not a public person.

18 47. Since the filing of my Declaration with this Court on July 25, 2011,  
19 Docket No. 314, where I put all of Defendant Taitz’s continued postings and  
20 publications with false statements, false allegations, false recitations of this case,  
21  
22  
23  
24  
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1 pleadings on file with this case, and incitement against Lisa Ostella and me, Taitz  
2 has continued these actions. Taitz posted the following:  
3

4 **EXHIBIT “5”**

5 **World Net Daily is sending flyers and asking for money for Gary ...**

6 [www.orlytaitzesq.com/](http://www.orlytaitzesq.com/)

7 <http://www.orlytaitzesq.com/?p=25677>

8 6 hours ago by dr\_taitz@yahoo.com

9 It is despicable, that attorneys claiming to be on the same side would  
10 collude with a known convicted felon, forger and thief Lisa *Liberi*, put their  
11 name and license under garbage drafted by her and World Net Daily would  
12 promote such attorney ...

13 **EXHIBIT “6”**

14 **Help me find this person, whose IP is now connected to all the ...**

15 [www.orlytaitzesq.com/](http://www.orlytaitzesq.com/)

16 <http://www.orlytaitzesq.com/?p=25592>

17 3 days ago by dr\_taitz@yahoo.com

18 She refused to file her drivers license or any other identification paper, as  
19 she said that she is afraid of me because she believes that attorney Orly  
20 Taitz tried to hire a hit-man to kill Lisa *Liberi*, assistant of Philip Berg and  
21 she also tried to hire a ...

22 **EXHIBIT “7”**

23 **submitted to Judge Andrew Guilford in Central District of CA today ...**

24 [www.orlytaitzesq.com/](http://www.orlytaitzesq.com/)

25 <http://www.orlytaitzesq.com/?p=25553>

26 [http://www.orlytaitzesq.com/?attachment\\_id=25549](http://www.orlytaitzesq.com/?attachment_id=25549)

27 [http://www.orlytaitzesq.com/?attachment\\_id=25550](http://www.orlytaitzesq.com/?attachment_id=25550)

28 [http://www.orlytaitzesq.com/?attachment\\_id=25551](http://www.orlytaitzesq.com/?attachment_id=25551)

[http://www.orlytaitzesq.com/?attachment\\_id=25552](http://www.orlytaitzesq.com/?attachment_id=25552)

<http://www.orlytaitzesq.com/wp-content/uploads/2011/09/Liberi-v-TAitz-10.10.2011-hearing-motion-to-dismiss-Law-offices.pdf>

<http://www.orlytaitzesq.com/wp-content/uploads/2011/09/Liberi-v-Taitz-12.23.2010-pdf-memorandum-by-Judge-Robreno.pdf>

<http://www.orlytaitzesq.com/wp-content/uploads/2011/09/Lisa-Liberi-criminal-record-bankruptcy-record.pdf>

<http://www.orlytaitzesq.com/wp-content/uploads/2011/09/declaration-of-Lisa-Liberi-first-5-digits-of-SSN-redacted-.pdf>

1 4 days ago by dr\_taitz@yahoo.com  
2 Complaint at hand was filed by plaintiff Pennsylvania attorney Philip Berg,  
3 his assistant Lisa *Liberi* and web master Lisa Ostella, who for a short time  
4 was a volunteer web master for defendant Orly Taitz, but who is currently  
assisting Berg, ...

5 **EXHIBIT “8”**

6 **submitted today | Dr. Orly Taitz Esquire**

7 [www.orlytaitzesq.com/](http://www.orlytaitzesq.com/)

8 <http://www.orlytaitzesq.com/?p=24922>

9 Aug 24, 2011 by dr\_taitz@yahoo.com

10 Re *Liberi* v Taitz 11-cv-485. Request for leave of court to file a request to  
11 correct a serious error made by a docketing clerk in entries #289, #300 and  
correct a relating error in order by the court from August, 19, 2011 and for  
leave of court to file ...

12 **EXHIBIT “9”**

13 **submitted today to judge Guilford. Does anyone know, if any of his ...**

14 [www.orlytaitzesq.com/](http://www.orlytaitzesq.com/)

15 <http://www.orlytaitzesq.com/?p=24901>

16 [http://www.orlytaitzesq.com/?attachment\\_id=24902](http://www.orlytaitzesq.com/?attachment_id=24902)

17 [http://www.orlytaitzesq.com/?attachment\\_id=24903](http://www.orlytaitzesq.com/?attachment_id=24903)

18 <http://www.orlytaitzesq.com/wp-content/uploads/2011/08/Liberi-v-Taitz-final-request-to-modify-the-order-of-litigation-history.docx>

19 <http://www.orlytaitzesq.com/wp-content/uploads/2011/08/Liberi-v-Taitz-request-to-correct-an-error-in-order-and-leave-of-court-to-file-12b6.pdf>

20 Aug 23, 2011 by dr\_taitz@yahoo.com

21 *Liberi* v Taitz final request to modify the order of litigation history *Liberi* v  
Taitz request to correct an error in order and leave of court to file. ...

22 TAITZ@GMAIL.COM. Attorney for “Orly Taitz, inc” in *Liberi* v Taitz  
11-cv-485. 08.23.2011. Request for ...

23 **EXHIBIT “10”**

24 **More on connection between WND and Kreep | Dr. Orly Taitz Esquire**

25 [www.orlytaitzesq.com/](http://www.orlytaitzesq.com/)

26 <http://www.orlytaitzesq.com/?p=24891>

27 Aug 23, 2011 by dr\_taitz@yahoo.com

28 Recently Editor of Post and E-mail Sharon Rondeau published a criminal  
record of Lisa *Liberi*, assistant to Berg, she explained that the law suit was

bogus, there was no defamation, no invasion of privacy, that all publication about Berg's ...

## EXHIBIT “11”

## [Update on HI and the Boehner plan vote | Dr. Orly Taitz Esquire](#)

[www.orlytaitzesq.com/](http://www.orlytaitzesq.com/)

<http://www.orlytaitzesq.com/?p=24293>

Jul 29, 2011 by dr\_taitz@yahoo.com

I am still having to spend enormous amount of time on this bogus law suit filed by Philip Berg, his local counsel Gary Kreep and his sidekicks Lisa *Liberi* and Lisa Ostella. This is an enourmous waste of my time, money and energy, which could ...

48. Orly Taitz also published all the above posts, attached as Exhibits, on

her accounts with Facebook (in approximately eight [8] places on Facebook); beforeitsnews.com; friends feed; twitter; freedables.com; and other social network sites and search engines including internationally and in foreign languages. We have copies and all the links should the Court wish them to be filed. Orly Taitz also sent these posts through hundreds of RSS feeds to thousands of private and public blogs and websites for posting.

49. There is absolutely no permissible purpose, no tangible reason for all these postings regarding Lisa Ostella our attorney or me and it does not serve any legitimate purpose. All these postings since 2009 have kept me living in daily fear for son, husband or me. Further, it has caused my family and me severe (substantial) emotional and mental distress to the point I ended up hospitalized for heart complications due to the stress and repeated emergency personnel at my

1 home due to heart complications and other medical complications caused by the  
2 harassment and stress.  
3

4 50. Your Honor has made comment regarding the docket and all the  
5 filings several times. The reason Plaintiffs are forced to file so much paper is  
6 because Orly Taitz will take one document and publish it in hundreds of places on  
7 the Internet. We then feel it necessary to file them to substantiate our statements as  
8 Taitz continues lying to the Court and accusing of crimes we have never  
9 committed.  
10  
11

12 51. Orly Taitz has proven to be completely fixated on Lisa Ostella and me  
13 to an extreme that I feel warrants psychiatric intervention. Otherwise, Orly Taitz,  
14 with all her rage, is going to end up physically harming our children, family  
15 members or us.  
16  
17

18 52. In fact, in Orly Taitz's post of September 15, 2011, attached hereto as  
19 **EXHIBIT “6”** Orly Taitz goes after my mother, Shirley Waddell with false tales  
20 and gives the names of relatives of my husband, who Taitz could have only  
21 obtained by conducting further illegal background checks. Orly Taitz has also  
22 stalked my son. Your Honor, this must stop, I am asking this Court to please stop  
23 this woman.  
24  
25

26 53. All of the above posts I obtained by going directly to Orly Taitz  
27 website at [www.orlytaitzesq.com](http://www.orlytaitzesq.com) and in the search box typing “Liberi” each and  
28

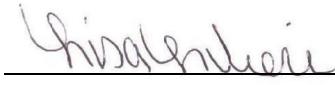
1 every post with my name came up, at which time I took a screen shot and printed  
2 the page to PDF. The above postings by Taitz are only over the past month and are  
3 the same type of postings Orly Taitz has done regarding me since April 2009, all  
4 with false tales, false allegations, where I am being blamed for what Orly Taitz is  
5 actually doing to us.  
6

7  
8 54. Orly Taitz incites people against us, as proven by the postings by her  
9 own web person, Bob Stevens on [www.skypeassholes.com](http://www.skypeassholes.com) and  
10 <http://domesticenemies.net>, as well as Taitz's own statements. I certainly believe  
11 this justifies and substantiates her cyber-stalking of Lisa Ostella and me.  
12

13  
14 55. Your Honor, Orly Taitz will **not** stop until the Court's force her to  
15 stop her dangerous, illegal and damaging conduct.  
16

17 I declare under the penalty of perjury of the Laws of the United States and  
18 the State of California that the foregoing is true and correct.  
19

20 Executed this 20<sup>th</sup> day of September, 2011 in the State of New Mexico.  
21

22   
23 Lisa Liberi, Declarant  
24  
25  
26  
27  
28